

Beth McCullough

From: Ben Gastel
Sent: Wednesday, January 15, 2014 10:18 AM
To: Kristen Johnson Parker; Alan Winchester; Brady Hermann; Daniel M. Rabinovitz; Daniel Tranen; Frederick H. Fern; Geoffrey M. Coan; Heidi A. Nadel; Jeffrey Sternklar; Jessica Saunders Eichel; Joseph P. Thomas; Joshua A. Klarfeld; Judi Abbott Curry; Matthew E. Mantalos; Matthew P. Moriarty; Melinda L. Thompson; Michael Gottfried; Nicki Samson; Paul Moore; Paul Saltzman; Richard A. Dean; Robert A. Curley , Jr.; Ryan Ciporkin; Scott H. Kremer; Scott J. Tucker; Thomas W. Coffey; Adriana Suarez Desmond; Amy Mione; Anne Andrews; David Molton; Greg Skikos; Harry Roth; Honor Heath; Jessica Conte; Jim Stoll; John Thornton; Karen Schaeffer; Marc Lipton; Margaret Kitchen; Melvin Wright; Michael Coren; Michael Galligan; Rebecca Fordon; Steffani Chocron; Susan Marttala; Terry Dawes; Thomas Sobol; William Baldiga; Alan J. Bozer; Alan Winchester; Allen Neely; Brady Hermann; Brett J. Bean; C. Houston Foppiano; Clinton R. Shaw; Cynthia A. Palin; Daniel M. Rabinovitz; Daniel Tranen; David E. Fialkow; David H. Batten; Emmittie H. Griggs; Eric J. Hoffman; Frederick H. Fern; G. Adam Moyers; Geoffrey M. Coan; Halley M. Stephens; Heidi A. Nadel; Jack R. Reinholtz; Jason D. Lewis; Jay Blumberg; Jessica Saunders Eichel; Joanna J. Chen; John M. Lovely; Joseph P. Thomas; Joseph R. Lang; Joshua A. Klarfeld; Judi Abbott Curry; Kenneth B. Walton; Kristen R. Ragosta; Marcy H. Greer; Mark E. Anderson; Martin Hyman; Mary-Rose Watson; Matthew Daly; Matthew E. Mantalos; Matthew P. Moriarty; Melinda L. Thompson; Michael Gardner; Nicki Samson; Paul Saltzman; Richard A. Dean; Robert A. Curley , Jr.; Ryan Ciporkin; Scott H. Kremer; Scott J. Tucker; Sean E. Capplis; Stephen A. Grossman; Theresa A. Domenico; Thomas Althauser; Thomas W. Coffey; Timothy J. Dardas; William E. Christie; Yvonne K. Puig; Chris J. Tardio (chris@gideoncooper.com); Puig, Yvonne K.; Sarah Kelly (SKelly@nutter.com); 'lhollabaugh@babc.com' (lhollabaugh@babc.com); Hoffman, Eric; Greer, Marcy; C.J. Gideon; Chris Tardio; Daniel Clayton; Daniel M. Rabinovitz; Edgar Taylor, III; Elizabeth Cabraser; Frederick H. Fern; George Nolan; Gerard Stranch; J. Kyle Roby; Jason Denton; John O. Belcher; Joseph P. Thomas; Kurt W. Maier; Larry Lamont Crain; Marc Lipton; Mark Chalos; Mark Zamora; Matthew P. Moriarty; Melinda L. Thompson; Nathan Hunt; Nicki Samson; Patrick Fennell; Paul J. Krog; Randall Kinnard; Rebecca Blair; Richard A. Dean; Robert H. Gaynor; Thomas Sobol; Thomas W. Coffey; William Daniel Leader, Jr.; William Hance Lassier, Jr.; Fredric Ellis; jjblumberg@blumberglawoffices.com, cshorts@blumberglawoffices.com, cwolk@blumberglawoffices.com
Cc: Gerard Stranch; Kim Dougherty; Marc E. Lipton; Mark P. Chalos; Mark Zamora; Patrick T. Fennell; Fredric Ellis; Thomas Sobol
Subject: Meet and Confer Conference
Attachments: 13-11-26 Joint Deposition Protocol - Proposed Order (00306797).doc; 13-11-21 Proposed ESI Protocol (00306376).docx; TNPROFILEFORMJAN10MZEDITS.PDF

All,

We will hold an additional meet and confer on Thursday January 16, 2014 at 12 est/11 cst to address the issues raised by Judge Boal's order of January 7, 2014 and the issues raised by Judge Saylor at last Friday's status conference. Once again we recirculate the proposed deposition, ESI protocols, and a working draft (with comments) of the PSC's proposed profile form for your comment and review. This call is open to all defense counsel who have appeared in the MDL Court. We encourage anyone interested in providing input on the any of these forms to be used in this litigation to participate.

To the extent that you wish to make edits, please do so in a redline and send to Kim Doughtery, Mark Zamora, and me before the call.

The dial in for the call is:

866-528-2256
Code: 4421223

Warmest Regards,

Ben Gastel
Branstetter, Stranch & Jennings, PLLC
227 Second Ave. N.
Fourth Floor
Nashville, TN 37061-1631
P: 615.254.8801
F: 615.255.5419